

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA**

<b>SHARON R. COMPISE,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>vs.</b>	)	<b>Case No. CIV-22-489-JD</b>
	)	
<b>THE BOARD OF COUNTY</b>	)	
<b>COMMISSIONERS OF OKLAHOMA</b>	)	
<b>COUNTY, a county government, and</b>	)	
	)	
	)	
<b>DAVID B. HOOTEN, individually and in</b>	)	
<b>his official capacity as Oklahoma County</b>	)	
<b>Court Clerk,</b>	)	
	)	
<b>Defendant(s).</b>	)	

**DEFENDANT HOOTEN’S ANSWER TO AMENDED COMPLAINT**

The Defendant, David B. Hooten, by and through his attorney of record, Billy Coyle, and the Coyle Law Firm, answers the *Amended Complaint* filed on July 22, 2022 (Doc. 12) herein:

1. Mr. Hooten Admits in part as to the Plaintiff’s purported sex, but lacks knowledge or information sufficient to form a belief of whether or not Plaintiff lives in Logan County as alleged in Paragraph 1 of the Amended Complaint.
2. Mr. Hooten Admits as to being a named defendant in the Plaintiff’s Complaint, the remainder of the official vs individual capacity bears no response in Paragraph 2 of the Amended Complaint.
3. Mr. Hooten lacks sufficient knowledge or information to form a legal conclusion to determine the proper jurisdiction and law governing this purported lawsuit as alleged in Paragraph 3 of the Amended Complaint.

4. Mr. Hooten Admits in so much that venue is proper, but Denies in part as to any inference that may be drawn as to the purported actions as alleged in paragraph 4 of the Amended Complaint.
5. Mr. Hooten Admits that he was the elected Oklahoma County Clerk, but Denies the observations of the Plaintiff and demands strict proof in Paragraph 5 of the Amended Complaint.
6. Mr. Hooten Admits in part and Denies in part the allegations named in Paragraph 6 of the Amended Complaint.
7. Mr. Hooten Denies the allegations as stated in Paragraph 7 of the Amended Complaint.
8. Mr. Hooten Admits in so much the Plaintiff was employed by the Oklahoma County Clerk's Office in Paragraph 8 of the Amended Complaint.
9. Mr. Hooten Denies and in the same demands strict proof thereof of the allegations as contained in Paragraph 9 of the Amended Complaint.
10. Mr. Hooten Denies the allegations as stated in Paragraph 10 of the Amended Complaint.
11. Mr. Hooten Denies the allegations as stated in Paragraph 11 of the Amended Complaint and demands strict proof thereof.
12. Mr. Hooten Denies the allegations as stated in Paragraph 12 of the Amended Complaint.
13. Mr. Hooten Denies the allegations as stated in Paragraph 13 of the Amended Complaint.
14. Mr. Hooten Denies the allegations as stated in Paragraph 14 of the Amended Complaint.
15. Mr. Hooten Denies the allegations as stated in Paragraph 15 and demands strict proof thereof.
16. Mr. Hooten Denies the allegations as stated in Paragraph 16 of the Amended Complaint.

17. Mr. Hooten Denies the allegations as stated in Paragraph 17 of the Amended Complaint and demands strict proof thereof.

18. Mr. Hooten Denies the assertion as stated in Paragraph 18 of the Amended Complaint.

19. Mr. Hooten Denies the assertion as stated in Paragraph 19 of the Amended Complaint.

20. As to the Plaintiff's prayer of relief, Mr. Hooten Denies and requests this Court to dismiss this case against him and award him costs for defending this action.

### **AFFIRMATIVE DEFENSES**

21. Defendant Hooten asserts any and all defenses as listed in Fed. Rules of Civ. Pro. Rule 12(b), specifically,

- a. Lack of subject matter jurisdiction;
- b. Lack of personal jurisdiction;
- c. Improper venue;
- d. Insufficient process;
- e. Insufficient service of process;
- f. Failure to state a claim upon which relief can be granted.

22. Defendant Hooten further gives notice and reserves any other defenses relied upon if and when such defenses known during the course of litigation and hereby reserves the right to amend his answer to assert any other defenses as become known or available.

### **CONCLUSION**

WHEREFORE, premises considered, the Defendant respectfully requests this Court deny the relief requested in the Plaintiff's Complaint and grant any and all relief to Defendant Hooten as required by justice, inclusive of costs and attorney fees to defend this action.

SIGNATURE OF COUNSEL ON FOLLOWING PAGE

Respectfully submitted,

s/ John W. “Billy” Coyle, IV

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BILLY COYLE, OBA #20045

COYLE LAW FIRM

125 Park Avenue, First Floor

Oklahoma City, OK 73102

Telephone: 405-415-4537

Fax: 405-415-4535

Email: [bc@coylelaw.com](mailto:bc@coylelaw.com)

*Attorney for Defendant Hooten*

### **CERTIFICATE OF SERVICE**

This is to certify that on this 4<sup>th</sup> day of August, 2022, I electronically transmitted the foregoing document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrant:

Mark Hammons  
Hamons Hurst & Associates  
[taylor@hammonslaw.com](mailto:taylor@hammonslaw.com)

s/ Billy Coyle

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BILLY COYLE